

U.S. Department of Labor

Occupational Safety and Health Administration



218A West Main Street
Belleville, IL 62220
618/277-5300

RECEIVED

September 17, 1984

SEP 19 1984

EPA REGION 5
OFFICE OF REGIONAL
ADMINISTRATION

U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

US EPA RECORDS CENTER REGION 5



Re: OSHA Complaint 70655766

Dear Sirs:

Attached is a Notice of Alleged Safety or Health Hazards, OSHA Form 7, regarding a suspected waste disposal exposure that has been investigated as to employee exposure. We are forwarding this to you for a possible environmental hazard. The investigation was initiated by a complaint from an employee who was on the job at the time the earth was opened. The employer was contacted and he admitted that the report was true and to be on the safe side they had taken samples to be analyzed and closed the earth immediately without trying to salvage the pipe that had been laid.

Several weeks later a letter was received from the employer which included a report by the consultants that had conducted the analysis, Clayton Environmental Consultants, Inc. (copy attached). Due to the concentrations of chemicals revealed in the tests it was decided you should be notified. This area is presently owned by the City of Sauget, Illinois and is reported to have been owned by Monsanto Chemical Company and was allegedly used as a waste disposal area by Monsanto and Edwin Cooper Corp.

If you have any questions regarding this matter, please contact this office at 618/277-5300.

Sincerely,

Gerald D. Gravatt
for Gerald D. Gravatt
Area Director

/bkk

Attchs.

RECEIVED

OCT 18 1984

IEPA-DLPC

*C:WMP
cc:RF
Cameron*



MOD Date

6/8/84

1. Complaint Number

70655766

2. Employer Name

MURPHY Co.

3. Site Location (Street, City, State, ZIP)

Number One American Bottoms Road (New Plant)

4. Mailing Address (If different) (Street, City, State, ZIP)

1340 N. Price St., St. Louis, Mo.

5. Management Official

Al Martinelli

6. Telephone Number

314 997-1400

7. Type of Business

Mechanical Contractors

8. Hazard Description. Describe briefly the hazard(s) which you believe exist. Include the approximate number of employees exposed to or affected by each hazard.

I am a pipefitter and we were installing a 16" water line. We were installing a 16" ductile push-joint pipe in the ditch near the entrance to the plant. Sand seems to be normal for the area when we came across a foreign type ground fill. It had a rotten odor and it was real spongy. The next day we were told to remove the pipe except for the pipe in this area. We questioned the contractor he stated they were to research the soil for the possibility of a toxic substance. That was about 3 weeks ago. My foreman said they ~~wouldn't~~ wouldn't give ^{him} the results or they had not taken any tests. So I proceed to seek help with OSHA. (Approx 4-6 people were ~~on~~ on this job)

Also ~~it~~ it has been ~~mentioned~~ mentioned to the contractor about having a place to wash up for lunch. ~~It has not been taken care~~ Nothing has been done yet.

9. Hazard Location. Specify the particular building or worksite where the alleged violation exists:

Entrance-Just INSIDE THE GATES ON THE NORTH SIDE.

MURPHY AND ASSOCIATES

1340 NORTH PRICE ROAD
ST. LOUIS, MISSOURI 63132
Area Code 314 997-6600

August 13, 1984

U.S. Department of Labor
218-A West Main Street
Belleville, Illinois 62220

Attention: Mr. Gerald D. Gravatt
Area Director

Reference: American Bottoms Regional
Wastewater Treatment Facility
Complaint #70655766
Soil Analysis from Clayton
Environmental Consultants, Inc.

Gentlemen:

Attached you will find a report from Clayton Environmental Consultants, Inc. concerning samples taken from the area involved in the subject complaint. Please review the above and contact this office if we can be of any further assistance.

Very truly yours,
Murphy Company


Jim Gorry
Project Manager

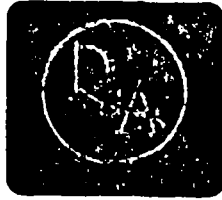
cc: Safety Job File w/att
Jim Watts - St. Louis Office
Chris Fitch - WA/TC
WA/TC Corresp.

JG/sc

RECEIVED
U. S. DEPARTMENT OF LABOR
OFFICE OF THE ASSISTANT ATTORNEY GENERAL

AUG 14 1984
REGION V
BELLEVILLE OFFICE

RUSSELL & AXON



Established in 1920

Engineers • Planners • Architects
Incorporated

RECEIVED

AUG 6 1984

WATC

August 3, 1984

Mr. E.G. Clawson
Walbridge, Aldinger Co./
Tarlton Corporation
#1 American Bottoms Road
Sauget, Illinois 62201

Re: 00087
File No. A1.20
Log No. 971

Dear Mr. Clawson:

Attached you will find a report from Clayton Environmental Consultants, Inc. (Industrial Hygienists). Included in their report are the results of analyses of two samples of the black material encountered during installation of the 16" water line. As can be seen, it is primarily oil and grease; however, it does have quantities of PCBs.

In view of the fact that this material was highly concentrated and had a tar-like consistency and workers were in the area for only 1 to 2 hours, it is our conclusion that no one was endangered (by direct contact or airborne exposure) in any way from the material encountered.

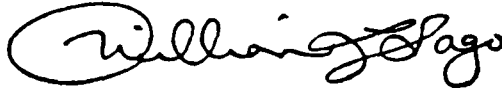
As you know, the area was covered with clean dirt shortly after discovery and it is to be covered by you with at least another two feet of fill before construction of the road. Prior to your resuming work in the area, we will again walk the site with you and make sure no material is exposed. It is imperative, however, during your road work that only filling occurs, not excavation. Therefore, please inform all of your personnel and subcontractors accordingly.

Mr. E.G. Clawson
August 3, 1984
Page 2

Should you have any questions, please advise.

Very truly yours,

RUSSELL & AXON

A handwritten signature in cursive script, reading "William L. Sago". The signature is enclosed in a large, loopy oval shape.

William L. Sago, P.E.
Vice President

WLS/slb

cc: Mr. Jim Gorry
Mr. John R. Zelle
Mr. Paul H. Darmer
Mr. Dennis R. Herzing

Attachment

Clayton Environmental Consultants, Inc.

25711 Southfield Road, Southfield, Michigan 48075. Telephone 313 424-8860

July 31, 1984

AUG 2 1984

Mr. William L. Sago, P.E.
Vice President
RUSSELL & AXON
#1 American Bottoms Road
Sauget, IL 62201

1	_____	A2.50
2	_____	
3	_____	A2.26
4	_____	J.W.F.
5	_____	K.L.F.
6	_____	
7	_____	
8	_____	
9	_____	
10	_____	

CEC Job No. 20666-15

Dear Mr. Sago:

At your request, I visited the American Bottoms construction site in Sauget, Illinois on May 20, 1984. The purpose of this visit was to review with you a recent problem involving some chemical wastes uncovered during excavation at the site. As we understand the situation, workers digging a trench (and laying a potable water pipeline) at a location approximately 200 feet northeast of the R&A field office, uncovered the suspect material. When you became aware of the situation you ordered work discontinued, the trench filled and the pipe already laid in this area, abandoned. Subsequently, a new route was selected for the pipe. During my visit, small quantities of material were exposed at several locations and two samples were collected. Subjectively, the material was a black tar-like substance. The apparent source was the adjacent #4 lagoon. The material was similar in both appearance and odor to materials observed during excavations in the summer of 1983 between the abandoned lagoons and Clayton Chemical Company.

The samples collected were submitted for analyses to Envirodyne Engineers, as you instructed. Samples were analyzed for PCBs, benzene, phenol, and oil and grease, and the results are presented in the following table.

	<u>Sample No. 1</u>	<u>Sample No. 2</u>
Total PCB	477 ppm	653 ppm
Benzene	1 ppb	1 ppb
Phenol	0.28 ppm	12. ppm
Oil and grease	29%	35%
Solids	82.2%	87.3%

Mr. William L. Sago, P.E.
Russell & Axon

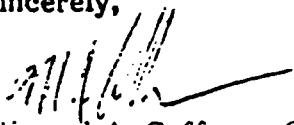
July 31, 1984
Page 2

It appears from our conversation that direct contact with the material by workers did not occur. However, the potential problem had been abated before I arrived at the site. It is not possible to assess the extent of worker exposure in this situation.

As previously indicated, some of the material was exposed during my visit. We recommend that this be covered with uncontaminated top soil or removed. In our recent telephone conversation, you indicated the materials were covered.

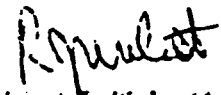
Should any additional excavation be required near the lagoons, we recommend prior planning and careful review to prevent a similar problem from occurring.

Sincerely,



Michael A. Coffman, C.I.H.
Industrial Hygienist

Approved by:



Richard J. Walcott, C.I.H.
Assistant Vice President
Manager, Industrial Hygiene Services

MAC/RJW/mhl